

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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JANE DOE NO. 1, JANE DOE NO. 2, and )  
JANE DOE NO. 3, )  
Plaintiffs, ) Docket No. 1:17-cv-11069-LTS  
v. )  
BACKPAGE.COM, LLC, CARL FERRER, )  
MICHAEL LACEY, and JAMES LARKIN, )  
Defendants. )  
\_\_\_\_\_  
)

**REQUEST FOR ENTRY OF DEFAULT**

Plaintiffs Jane Doe No. 1, Jane Doe No. 2, and Jane Doe No. 3 (collectively, "Plaintiffs") respectfully request that the Clerk enter an order of default against Defendants Backpage.com, LLC and Carl Ferrer, on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure. In support of this request, Plaintiffs submit the Declaration of Jessica L. Soto, appended hereto as Exhibit A. A proposed form of Notice of Default is appended hereto as Exhibit B.

JANE DOE NO. 1, JANE DOE NO. 2,  
and JANE DOE NO. 3

Respectfully submitted,

/s/ John T. Montgomery  
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Dated: June 18, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of June, 2018, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/ John T. Montgomery

Dated: June 18, 2018

John T. Montgomery